

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Estados Unidos Mexicanos,

Plaintiff,

v.

Diamondback Shooting Sports  
Incorporated, et al.,

Defendants.

No. CV-22-00472-TUC-RM

**ORDER**

Pending before the Court is the parties' Joint Notice Regarding Depositions and Written Discovery. (Doc. 61.) The Court having reviewed the parties' respective proposals,

**IT IS ORDERED:**

1. Plaintiff shall be allowed to take up to six (6) depositions of each Defendant's current and/or former employees, inclusive of any depositions noticed pursuant to Federal Rule of Civil Procedure 30(b)(6). Leave of Court is required to take additional depositions.
2. Defendants shall be allowed to collectively take up to fifteen (15) depositions of Plaintiff's current and/or former employees, inclusive of any depositions noticed pursuant to Federal Rule of Civil Procedure 30(b)(6). Leave of Court is required to take additional depositions.
3. Within thirty (30) days of serving a notice of deposition under Rule 30(b)(6), the parties shall meet and confer as required by Rule 30(b)(6)

1 regarding the topics to be addressed at the Rule 30(b)(6) deposition, the  
2 date for the deposition, and the length of the deposition.


3 4. There shall be no limit on the number of third-party depositions that are  
4 noticed by any party, with leave for any party—after good-faith personal  
5 consultation—to seek a protective order as to the taking of third-party  
6 depositions. The parties shall work together in good faith to identify  
7 relevant third-party witnesses, including the current locations and accurate  
8 contact information for any possible third-party witnesses.

9 5. The parties shall produce for deposition all witnesses under their control,  
10 including officials and employees of the Mexican Government, and  
11 officers, directors, and employees of the corporate Defendants, at mutually  
12 agreeable locations, or remotely upon the parties' written stipulation. In the  
13 event a party remotely deposes a witness who resides in Mexico, the time  
14 zone of the witness's location will be the relevant time zone for the  
15 deposition. Other parameters of any such foreign depositions, including  
16 date, time, location, ground rules, etc., shall otherwise be governed by the  
17 Federal Rules of Civil Procedure. Pursuant to Plaintiff's stipulation (Doc.  
18 73), any depositions in Mexico of Mexican and third-country nationals  
19 under Plaintiff's control may proceed as provided in the Federal Rules of  
20 Civil Procedure and will not necessitate the presence of a Mexican judicial  
21 officer. The parties must confer in good faith prior to filing a motion  
22 concerning the location or parameters of a deposition or the mechanisms by  
23 which a deposition of a foreign witness will occur.

24 6. Plaintiff may propound 25 written interrogatories per Defendant.  
25 Defendants may jointly propound 25 written interrogatories to Plaintiff, and  
26 each Defendant may individually propound up to 10 additional  
27 interrogatories to Plaintiff. Leave of Court is required to propound  
28 additional interrogatories.

1           7. There shall be no limit on the number of requests for production or requests  
2           for admission, though the parties are granted leave to seek such a limit at a  
3           later date.

4           Dated this 7th day of June, 2024.

5  
6  
7  
8             
9           Honorable Rosemary Márquez  
            United States District Judge